

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	Master File No. 12-md-02311
ALL PARTS	:	Honorable Marianne O. Battani
THIS DOCUMENT RELATES TO: ALL CASES	:	

SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY

End-Payor Plaintiffs (“EPPs”) hereby provide this supplement to their motion to modify the stipulated order of discovery (ECF No. 783). The motion had identified Fujikura Ltd. (“Fujikura”) and Furukawa Electric Co. (“Furukawa”) as defendants with whom EPPs were unable to meet and confer.

In fact, Fujikura corresponded by e-mail with EPPs to inquire what was sought from Fujikura that had not been previously provided in its interrogatory responses in the *Wire Harness* case (Case No. 212-cv-00100), and EPPs confirmed that they were not seeking anything further from Fujikura. Fujikura did not take any position on EPPs’ proposed modification of the stay.

Furukawa corresponded by e-mail with EPPs to state that, in its opinion, EPP’s request was moot as to Furukawa based on its representation that it had already provided this information to EPPs. EPPs do not believe their request is moot, as the information Furukawa provided was incomplete and never supplemented. For these reasons, EPPs’ motion properly names Furukawa as a defendant with whom EPPs were unable to meet and confer because,

beyond its e-mail, Furukawa ignored other attempts made by EPPs to meet and confer on the relief we sought per Local Rule 7.1.

Date: August 27, 2014

Respectfully submitted,

/s/ Elizabeth Tran

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CERTIFICATE OF SERVICE

I, Steven N. Williams, hereby certify that I caused a true and correct copy of the **SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 27, 2014.

/s/ Steven N. Williams

Steven N. Williams